



THE TULALIP TRIBES

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NATURAL AND CULTURAL RESOURCE DEPARTMENT

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The Tulalip Tribes are the successors in interest to the Snohomish, Snoqualmie, and Skykomish tribes and band signatory to the Treaty of Point Elliott

October 24, 2012

Ted Sturdevant, Director
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

RE: Comments on Department of Ecology Update of Technical Support Document for Fish Consumption Rates

Dear Director Sturdevant,

As you know, the Tulalip Tribes completed the first tribal fish consumption survey in Washington State, together with the Squaxin Island Tribe in 1996. This study, which was reviewed scientifically, indicates how much higher fish consumption rates are at Tulalip than those currently established for Washington. Our intent then, as it is now, sixteen years later, is to protect the health of our members who consume, and who have always consumed, much larger portions of fish than is reflected and protected by Washington State's sediment and water quality standards. As it stands, our tribal members continued to be at risk by consuming one of the most culturally central and important food resources to us -- our local fish and shellfish.

Tulalip's study, as well as those from other regional tribes, were analyzed and included in the Department of Ecology's Technical Support Document (TSD). In reviewing the recently released "update" to the TSD, we offer these brief comments:

- Tulalip believes that the first draft of the technical support document released for review in October, 2011, was a more comprehensive document than this updated version which leaves out key information needed for the adoption of accurate default fish consumption rates in Washington.
- We are very disappointed that a default FCR recommendation, contained in the original technical document, has been removed from this version, and would like to see it restored in the TSD.
- We continue to support tribal comments and input to the original draft TSD, and believe that these tribal comments continue to be relevant to this round of public review and commenting.

The Tulalip Tribes remain committed to ensuring the revision and adoption of a new Fish Consumption Rate that is protective of our members' health, and again implore you to move forward expeditiously in the establishment and adoption of a new and accurate fish consumption rate for the State of Washington.

Sincerely,

Ray Fryberg, Executive Director
Natural Resources Department

Cc: Terry Williams, Libby Nelson, Treaty Rights Office